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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TRACEY KOONCE, an individual,
 Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada Limited
 Liability Company; DOES I-X, inclusive; and ROE
 CORPORATIONS I-X, inclusive,
 Defendants.

Case No.: 2:22-cv-02061-CDS-DJA
 (Lead Case)

PAUL TAYLOR, an individual,
 Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada Limited
 Liability Company; DOES I-X, inclusive; and ROE
 CORPORATIONS I-X, inclusive,
 Defendants.

Consolidated With:
 Case No.: 2:22-cv-02069-CDS-DJA

DAVID PERSI, an individual,
 Plaintiff,

vs.

MGM GRAND HOTEL, LLC, a Nevada Limited
 Liability Company; DOES I-X, inclusive; and ROE
 CORPORATIONS I-X, inclusive,
 Defendants.

Consolidated With:
 Case No.: 2:22-cv-02087-CDS-DJA

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STIPULATION AND ORDER TO EXTEND TIME TO FILE
PROPOSED JOINT PRE-TRIAL ORDER

IT IS HEREBY STIPULATED by and between Plaintiffs, by and through their attorneys of record, ADAM R. FULTON, ESQ. and LOGAN G. WILLSON, ESQ., of the law firm of JENNINGS & FULTON, LTD., and Defendants, by and through their attorneys of record, PAUL T. TRIMMER, ESQ., of the law firm of JACKSON LEWIS P.C., to extend the time to file the [Proposed] Joint Pre-Trial Order. Pursuant to the August 29, 2023 Revised Joint Discovery Plan and Scheduling Order Special Scheduling Review Requested [ECF No. 40], the deadline to file the [Proposed] Pre-trial Order is April 19, 2024.

Counsel for the parties have recently resolved six (6) matters, none of which involve the Plaintiffs in this matter, that involve similar facts and circumstances as the present matter. Those matters, had they not been resolved, would have been consolidated with the present consolidated matter. Additionally, there are pending matters that the parties will seek to consolidate with this matter. Specifically, *Lynn Sisson v. MGM Resorts International* (Case No. 2:23-cv-02045-GMN-EJY), *Kimberly Gwizdala v. New York-New York Hotel & Casino, LLC* (EEOC Charge No. 487-2021-01989, which will be filed upon receipt of the Notice of Closure and Right to Sue that has been requested), and *Christina Nishanian v. MGM Resorts International* (EEOC Charge No. 487-2022-00232, which will be filed upon receipt of the Notice of Closure and Right to Sue that has been requested). Defendants have agreed to accept and waive service once *Kimberly Gwizdala v. New York-New York Hotel & Casino* and *Christina Nishanian v. MGM Resorts International* have been filed. Then, the parties will submit a stipulation and order to consolidate all pending matters. There are no other matters that are expected to be added once this is completed.

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1 The parties have worked diligently to attempt to resolve approximately 15 cases and have
2 resolved seven (7). The parties request the Court extend the deadline 60 days to file the [Proposed]
3 Pre-trial Order for all pending matters to be consolidated into this matter.
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5 **IT IS SO STIPULATED.**

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7 DATED: April 19, 2024

DATED: April 19, 2024

8 **JENNINGS & FULTON, LTD.**

JACKSON LEWIS P.C.

9 /s/ Logan G. Willson, Esq.
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16 **ORDER**

17 IT IS SO ORDERED:

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21 DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: 4/22/2024
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